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ORIGINAL
ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.

MSTV

June 23, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
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Washington, D.C. 20554

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Washington, DC 20036

RECEIVED

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JUN 23 2003

RE: Ex Parte Notice
Unlicensed Device Notice of Inquiry
ET Docket No.02-380

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Dortch:

On June 17 and 18, 2003, Mr. Jack Goodman (Sr. VP, General Counsel, NAB), Ms. Karen Kirsch (VP, Regulatory Affairs, NAB), Mr. David Donovan (President, MSTV), Mr. Victor Tawil (Sr. VP, MSTV), Ms. Anne Lucey (VP, Regulatory Affairs, Viacom), and Mr. Ken Aagard (Sr. VP of Operations, Engineering and Production Management, CBS) met with the following officials at the Federal Communications Commission:

The Honorable Kevin Martin, FCC Commissioner
Ms. Catherine Bohigian, Media Legal Assistant to Commissioner Martin
Ms. Susan Eid, Mass Media Advisor to Chairman Michael Powell
Mr. Jordan Goldstein, Sr. Legal Advisor to the Honorable Michael Copps
Ms. Stacy Robinson, Mass Media Advisor to the Honorable Kathleen Abernathy
Ms. Jennifer Manner, Senior Counsel to the Honorable Kathleen Abernathy
Mr. Barry Ohlson, Legal Advisor for Spectrum to the Honorable Jonathan Adelstein
Ms. Johanna Mikes, Media Legal Advisor to the Honorable Jonathan Adelstein
Mr. Ken Ferree, Chief, Media Bureau
Mr. Rick Chessen, Associate Bureau Chief, Media Bureau
Mr. Keith Larson, Deputy Chief Engineering, Media Bureau
Mr. John Wong, Engineer, Media Bureau
Ms. Susan Crawford, Engineer, Media Bureau

We discussed the comments and reply comments filed by MSTV, NAB and APTS in the above captioned proceeding regarding allowing unlicensed devices to operate in the broadcast band. In addition, we presented a brief video explaining the existing problems with wireless microphones. A transcript of the video is attached.

Sincerely,



David L. Donovan
President

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Wireless Microphone Presentation

June 17, 18, 2003

Transcript of video

Spectrum Problems: NFL Games

Announcer: And now ladies and gentlemen choosing to be introduced as a team here are the American Football Conference Champions

Narrator: The Super Bowl is a spectacle of sight and sound. But a coach and his team may not get there if he's distracted by communication problems.

Steelers Coach: Can anybody hear me?

Buffalo Coach: This freaking thing is making all kinds of noise, listen it's chattering isn't it.

Steelers Coach: Can you hear me? Can you hear me, Ron? Ron, can you hear me?

Cable Guy: It's not working?

Steelers Coach: This f--- thing sucks.

Narrator: In the past coaches talked using headsets connected by hard wire.

Tennessee Coach: I got somebody to hold this or am I gonna drag it myself?

Narrator: And usually had an assistant affectionately known as the cable guy to help keep him tangle free.

Steve Mariucci: First of all he's got to be in shape, because we are gonna be moving. He's got to make sure that I don't use up all the slack and gets ynnnk! You know and...and get choked.

Narrator: While the spaghetti of wire on the sideline sometimes seemed comical, the stretches of cable were very inefficient and sometimes dangerous.

Brian Belichick: It really was a mess beyond that it was just not safe. There's a number of documented cases, the most serious having been down Dallas where a coach got caught up in those wires and hit the turf when the throng of players came at him and was actually in a coma and had to stay back in Dallas for a couple of weeks. So it's just not a safe environment to have with all those cords running around with that many bodies operating on a sideline.

Narrator: In the mid 90's the NFL adopted wireless technology, like the coach to quarterback system.

Tamp Bay Coach: Tell him to curl it; it's third and five.

Quarterback: Keenan third and five, third and five.

Narrator: Which allows for faster play calling and is more than a casual communication system, the coaches' headset plugs into the belt pack that transmits the signal to the coaches communication distribution system behind the bench. The audio is sent into the transmitter that's on the side of the equipment rack, encrypted and sent from there up to the press box, the signal is retransmitted out to the quarterback where it is decrypted in his helmet.

Tampa Bay Coach: You Keenan McCardell get Keyshawn out of the game.

Quarterback: Key, Key, get out, get out.

Tampa Bay Coach: Y Shift, to strong right open, Y Shift, to strong right open, F left 58 ZN

Quarterback: Y Shift, to strong right open, F left 58 ZN.

Raven Coach: We're costly trying to keep this game at a manageable length to make it a high action high intensity type of pace for the fans, and anytime the quarterback communicator is made huge in that regard.

Narrator: Besides helping the head coach and quarterback that same wireless technology allows all of the coaches on the field to talk with each other and be connected to their assistants in the press box.

Dallas Asst.: What do we need to get a 25 yard line for sure?

Coach: We'd like to get to the 25.

Dallas Asst: To make a sure kick you gotta get it to the 25.

Narrator: It also creates a safer bench area. Without cables to trip over players running out of bounds only worry about slowing down. For years referees have used wireless microphones to announce penalties.

Referee: Offside, 56 Defense, still first down.

Narrator: And in 1999 an instant replay system that uses wireless communication devices became part of the game. Its impact was felt at last year playoffs when on the field communication started a review that changed the season for the Patriots.

Announcer: Woodson Showing Blitz! Here he is bearing down on Brady!! Caused the fumble! Biekert dives on the ball! The Raiders have the ball!

Referee: After reviewing the play, the quarterback's arm was going forward, it is an incomplete pass.

Narrator: More than X's and O's, the NFL game has evolved into a big time production that requires constant and meticulous coordination through the use of wireless technology. This in never more

evident than at the Super Bowl where up to 5,000 devices use as many as 1,000 different frequencies. Knowing the value of wireless communication, coaches cringe at the thought of losing it.

Brian Belichick: I just I ...I can't imagine... I....I imagine how we would regress ourselves that way. The next step I guess would be to take away our digital technology. Let's go back to 16mm. Let's take away the computers all together and me go back grease board or a chalkboard and deal with all the chalk. Let's go back to the mimeograph machine, that'll be real good. We can put our game plans on the old crank, uh, blue, uh, blue line mimeograph machines.

Narrator: Only through coordinated shared use of the broadcast spectrum and consideration for replacement spectrum lost due to the digital transition, can the National Football League continue to give fans the ultimate sports entertainment experience.